

201-685-5198

April 10, 1989

Kathleen Doyle Siftar
U. S. Environmental Protection Agency, Region III
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Building, 6th Floor
Philadelphia, PA 19107

Re: Moyer Landfill Site

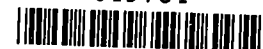
Dear Ms. Siftar:

We have reviewed the information you provided regarding the possible connection between Duane Marine Corporation and Moyers Landfill as it may relate to waste generated by National Starch.

From these records, the most that can be learned is that Duane Marine contemplated (and apparently had the approval of the Pennsylvania Department of Environmental Resources) disposing at the Moyer site certain wastes that it handled for various of its customers, including National Starch and Chemical Corp. I did not notice any documents, nor am I aware of any information, indicating that there actually were any shipments of material from Duane Marine to the Moyer Landfill. It seems very unlikely that there were any such transshipments, at least in the time frame suggested by the documents you sent to us (May 1979 - May 1980) since the site was temporarily closed by DEP in April 1979 and ordered by a state court to reduce the volume of waste that had accumulated at the site. After it failed to do so, EPA permanently closed the site and invoked the newly enacted provisions of CERCLA to achieve a privately funded PRP site remediation.

As you might assume, Region II EPA sent a similar CERCLA information request to all PRP's in the Duane Marine matter, including our company, and we all responded by sending EPA whatever documents we could find relating to Duane Marine. Those documents and information comprise essentially the same data which Region III EPA has requested in its CERCLA information

649784



Ms. K. D. Siftar
U. S. Environmental Protection Agency

request to our Company for the Moyer Landfill site. Since this data is already in EPA's possession and control, I believe we should be considered to have complied with Region III EPA's CERCLA request.

By copy of this letter, I am requesting that EPA, Region II provide such documents and information to its Region III offices, together with any other information it may have secured from other sources, relating to possible transshipments of waste from Duane Marine to Moyer Landfill.

Please let me know if you have any further questions.

Very truly yours,

A. M. Samson, Jr.
Counsel, Regulatory Affairs

AMS:ps

cc: H. Graulich
Ms. Janet Feldsten
U.S. EPA, Region II
26 Federal Plaza
New York, NY 10006

Deane Bartlett

3RC21

ORC.

Send
Nat'l Stack
+ Chemical